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December 19, 2014

Honorable Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: Alexia Palmer v. Trump Model Management, LLC, et al.
Civil Action No. 14-cv-8307 (AT)**

Dear Judge Torres:

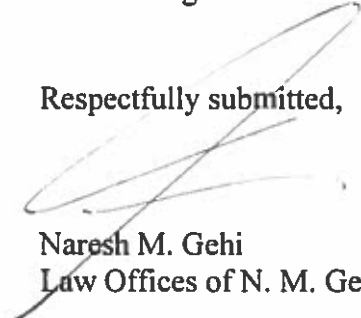
We represent plaintiff Alexia Palmer ("Ms. Palmer") in the above-referenced action. We write in response to the December 19, 2014 letter submitted by defendants Trump Model Management LLC and Corinne Nicolas ("defendants"). In the letter, defendants requested an extension of time to file a proposed Case Management Plan and Scheduling Order because Ms. Palmer intends to amend her complaint.

Ms. Palmer does intend to ask this Court for leave to amend her complaint. However, we do not believe that amendment warrants a delay in the submission of a proposed joint Case Management Plan and Scheduling Order, or a rescheduling of the initial conference with Your Honor. To the contrary, we believe that the parties can discuss, and agree to, a Case Management Plan and Scheduling Order while taking into consideration Ms. Palmer's intention to amend her complaint. We have reached out to defendants' counsel, via email and phone, in order to do so.

We further believe that a number of confusions have arisen in proceedings thus far, and that an initial conference with Your Honor would improve the clarity and efficiency of these proceedings. As an example, defendants have already served Ms. Palmer with their First Requests for Admission, but the parties have not yet been able to discuss a proposed Case Management Plan and Scheduling Order, Section 6 of which would set the agreed-upon timetable for requests to admit. Ms. Palmer is therefore uncertain whether or not to respond to defendants' requests, and whether or not to submit her own requests to admit in turn. She is similarly uncertain of the propriety of, and timetable for, subpoenaing the Department of Labor to obtain more information about defendants' employment practices. We believe that the initial conference with Your Honor can eliminate confusion on these and other procedural matters, and in addition, address defendants' concerns with Ms. Palmer's complaint and Ms. Palmer's desire to amend it.

We have previously accommodated defendants' desire for an extension to file an answer, motion or to otherwise respond to Ms. Palmer's Amended Complaint. Stipulation, November 19, 2014, ECF No. 11. However, agreeing to a proposed Case Management Plan and Scheduling Order and proceeding with the initial conference with Your Honor, as scheduled, would expeditiously resolve the concerns of both parties regarding procedure and timetables, avoid unnecessary delays in litigation, and bring a quick and decisive end to any other lingering confusions or misconceptions. For these reasons, we respectfully oppose defendants' request to toll the parties' obligation to confer and submit a proposed Case Management Plan and Scheduling Order.

Respectfully submitted,



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Law Offices of N. M. Gehi, P.C.

Submitted via ECF

Cc: Patrick McPartland (via ECF)
